

NO. \_\_\_\_\_

FILED  
COURT OF CRIMINAL APPEALS  
7/21/2017  
DEANA WILLIAMSON, CLERK

**IN THE COURT OF CRIMINAL APPEALS  
OF TEXAS**

\_\_\_\_\_  
**JOHN CHAMBERS,**  
**Appellant/Petitioner**

**VS.**

**THE STATE OF TEXAS,**  
**Appellee/Respondent**

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***APPELLANT'S MOTION TO EXTEND THE TIME TO FILE PETITION  
FOR DISCRETIONARY REVIEW***

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**Seeking discretionary review of a decision of the Court of Appeals for the  
Thirteenth District of Texas at Edinburg and Corpus Christi in Appeal No.  
13-16-00079-CR**

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**TO THE HONORABLE COURT OF CRIMINAL APPEALS:**

COMES NOW, JOHN CHAMBERS, the Appellant/Petitioner in the above styled and numbered cause, by and through undersigned counsel, and submits this Motion for Extension of Time for Filing a Petition for Discretionary Review pursuant to Rules 49.8 and 10.5 of the Texas Rules of Appellate Procedure. In support of the same, Petitioner would show this Honorable Court as follows:

1. Petitioner's Petition for Review is due on July 24, 2017.
2. Gregory Perkes suffered a hand injury after a hedge trimmer struck it on July 8, 2017, and has not been able to perform typing and writing skills necessary to complete the petition. In addition, Chad P. Van Brunt, Petitioner's former appellate counsel, has recently been brought in as co-counsel to assist in the filing of this petition and he needs additional time to collaborate with undersigned counsel.
3. No prior extension has been filed for rehearing.
4. This request is not made for the purposes of delay, but that justice may be done.

**WHEREFORE, PREMISES CONSIDERED,** Petitioner prays that this Honorable Court extend the deadline to file Petitioner's Petition for Review for an additional 30 days, to and including August 23, 2017.

Respectfully submitted,

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By: /s/ Gregory T. Perkes  
Gregory T. Perkes

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By: /s/ Chad P. Van Brunt  
Chad P. Van Brunt

ATTORNEYS FOR APPELLANT,  
JOHN CHAMBERS

**CERTIFICATE OF SERVICE**

This certifies that on July 21, 2017, a true and correct copy of the above and foregoing document was served upon the Cameron County District Attorney's office via email.

/s/ Chad Van Brunt  
Chad P. Van Brunt